

The road to a cashless society – Developments in Norway

Over the last few years there has been a debate in Norway about whether Norway should become the world's first cashless society. Industry organisations have come out in favour of the proposition. A committee appointed by the Norwegian Conservative party stated in an interview 7 January 2017 that, in their view, Norway should aim to become a cashless society by 2030. In this article, we will provide an overview of the current Norwegian legal framework pertaining to cash payments and describe some of the legal challenges associated with removing cash from the economy.

1. Introduction

New ways to make payments is a topic that attracts a lot of interest in Norway these days.

The use of physical money in the Norwegian economy is diminishing. New and innovative payment solutions are popping up with a high frequency, and statutory law is to some extent developing accordingly. Technological developments have made it possible to create cost-effective electronic alternatives to banknotes and coins.

Because of these developments a number of market participants have expressed a desire to completely remove cash from the economy. A committee appointed by the Norwegian Conservative party stated in an interview 7 January 2017 that, in their view, Norway should aim to become a cashless society by 2030. The committee proposes that the current right to pay with central bank notes and coins (legal tender), see section 3.1.2 below, be abolished by 2020, followed by further steps to complete the transition and make Norway a cashless society by 2030. The Norwegian parliament, the "Storting", on the other hand, has expressed a desire to strengthen the framework for cash payments, and recently presented a proposal to this effect, hereunder a draft for new regulation on the banks' handling of cash, see section 3.3 below. Furthermore, several of the Norwegian governmental bodies charged with overseeing financial matters have in recent years on

occasion expressed their opinion on the matter, see section 3.3.1- 3.3.4.

A great many technological adaptations and administrative and legal changes would be necessary in order to turn Norway into cashless society.

In this article, we will provide an overview of the current Norwegian legal framework pertaining to cash payments and describe some of the legal challenges associated with removing cash from the economy. For instance, a move to a cashless society would require amendments to the legislation regulating the Norwegian monetary system and cash as legal tender (Sentralbankloven section 14; the Norwegian Central Bank Act (NCBA)), the requirements on banks to offer cash (Finansforetaksloven section 16-4; the Financial Entities Act (FEA)) and the consumer's right to make cash payments (Finansavtaleloven section 38; the Norwegian Financial Agreements Act (NFAA)). There are also other areas where careful considerations would be necessary if such changes were to be made, such as data protection and money laundering issues. These areas will be discussed in Part II. In Part III we will present our overall conclusion.

2. Background

Over the last few years there has been a debate in Norway about whether Norway should become the

world's first cashless society. Industry organisations have come out in favour of the proposition, including Finance Norway, The Finance Sector Union of Norway and the Enterprise Federation of Norway (Virke). The Norwegian Tax Administration and the Norwegian Consumer Council also support removing cash from the economy. Their arguments for working towards a cashless society include preventing financial crime, such as money laundering and the underground job market. Other types of crime such as theft and robbery would most likely also become less prevalent if cash is removed from the economy. In addition businesses could potentially benefit from lower costs due to not having to handle cash. Another point that is highlighted by proponents of a cashless society is that in Norway today, cash is only used for small item transactions and its use is becoming rarer by the day, particularly due to various cash apps such as Vipps, Fitbit Pay and Facebook Messenger.

The arguments against a cashless society include the practicality of using physical money and that the banks' IT-systems and electronic payment systems are not sufficiently reliable at all times in order for society to fully rely on electronic payments. Furthermore, non-profit organizations, the elderly and low-income to no-income citizens could potentially face challenges in a cashless society. Other objections often raised are the challenges a cashless society would pose to those who are not eligible for obtaining bankcards/accounts or persons without identity papers (the "non-bankable" part of the population), and concerns pertaining to too much surveillance from the banks and the authorities. If every single transaction is made electronically, in theory, all transactions can be traced. Such tracking and what this information may be used for by the service providers (for example marketing purposes) is a concern to many. People would also be forced to use banking and payment services for every purchase they want to make.

PART I

3. Norwegian financial legislation – cash as legal tender

3.1. Main provisions

3.1.1. The Norwegian Central Bank's issuance of money - legal basis

Pursuant to the section 1 of the NCBA, the Norwegian Central Bank (NCB) is charged with the issuance of the official currency of the Kingdom of Norway, the Norwegian krone. This includes the production of cash (notes and coins) and the issuance of electronic central bank money (central bank reserves). The NCB is by law the sole issuer of Norwegian cash (notes and coins), cf. section 13 of the NCBA.

Pursuant to section 14 of the NCBA, NCB's notes and coins are legal tender in Norway. (This statute must be interpreted in conjunction with section 38 of the NFAA, see 3.1.2 below.)

The NCB is also charged with ensuring that Norway has an effective payment system. This responsibility includes, among other things, ensuring sufficient production of cash to meet the public's demand, and ensuring that cash is available to the public. The latter obligation only extends to making cash available to the banks. Once cash has been made available to the banks, further accessibility to cash by the public is presumed to be the responsibility of the banks.

The NCB manages its obligation to supply cash through five central bank depots across Norway, from where the banks can pick up cash.

3.1.2. Customer agreements and cash payment

Section 38 of the NFAA sets forth general obligations pertaining to cash settlement. Section 39 of the act stipulates additional requirements regarding the time and place of payment. Although the NFAA in general is concerned with the relationship between financial institutions and customers, these two provisions also apply to cash payments directly from the payer (customer) to the payee (recipient), cf. its section 11 (2).

The abovementioned provisions of the NFAA must be read in conjunction with the NCBA, in particular its section 14, in order to fully understand what is the current legal situation as regards cash payments. In the event of a conflict between the two acts, the NFAA will in our view take precedence in accordance with the so-called "lex posterior"-principle.

Section 38 (1) of the NFAA provides the party entitled to receive payment with the right to demand settlement in cash: "Payment may be effected by transfer of the

amount to the payee's account unless otherwise agreed or the payee has requested payment in cash". Pursuant to section 38 (2), the payee may give further instructions concerning the method of payment, provided this does not entail a substantial additional expense or other inconvenience to the payer.

A consumer, however, may always elect to pay with cash, cf. section 38 (3): "A consumer is in all cases entitled to effect settlement with the recipient of the payment in legal tender". However, the creditor is not obligated to accept more than twenty five coins of each coin unit, cf. the section 14 (1) second sentence of the NCBA.

3.2. Requirements pertaining to taking deposits and handling of cash

A banking license pursuant to the section 2-7 of the NFEA is required for a Norwegian bank to be permitted take deposits and to handle cash.

Licensed banks have an exclusive right to take deposits from the public. This right entails a corresponding right to offer services relating to deposits and withdrawals of cash and payment services adjusted to the customer's needs, cf. the preparatory works, Prop. 125 L (2013-2014) p. 104.

Pursuant to section 16-4 of the NFEA, banks not only have a right, but also an obligation, to take deposits, and to make cash available to deposit holders upon request in accordance with the "expectations and needs" of its customers. Section 16-4 does not exclude banks from charging fees for these services, and it does not require that banks necessarily must carry out the actual cash handling.

The preparatory works to the NFEA state that it is at the discretion of the banks to assess whether the customers need for cash deposits and cash withdrawals is met, cf. Prop. 125 L (2013-2014) p. 105. Today, many banks operate with cash-free physical branches and so called "advisory" offices, and will refer the customers to "bank in store" or post offices if they wish to withdraw cash. Whether such branches/offices comply with the requirements set forth in section 16-4 is not clear.

Section 16-4 does, however, not preclude that a bank in exceptional cases would be permitted to refuse to

establish a customer relationship with a person or an entity as a result of special circumstances relating to the customer, e.g. under the rules of money laundering or because the client lacks credentials, cf. the Banking Law commission Report no. 1, NOU 1994: 19 financial Agreements and financial assignments p. 113.

Pursuant to the section 16-4 (2) of the NFEA, the Ministry of Finance may introduce "Regulations on the banks' obligation to accept and to make cash available to customers". The NCB and the Norwegian Financial Supervisory Authority ("Norwegian FSA") have published a proposal for such regulation in a document dated 29 September 2016, see also 3.3.3 below.

The banks' handling of cash incurs costs and part of such costs is charged to its customers. In a memo from 2014 the NCB estimates that the total cost associated with cash payments in 2013 were approximately NOK 3 billion. Most of the costs are evenly split between the customers and the banks. The average cost per cash transaction is estimated to be NOK 7.1 compared to NOK 4.14 for card transactions. The industry organisation Finance Norway, and others, argue that replacing cash with less costly alternatives would thus bring efficiency gains to the economy.

3.3. The consumers' right to pay in cash in practice

In recent years, the consumer's right to pay with cash, cf. section 38 (3) of the NFAA, has been debated and tested (legally) on several occasions. There are numerous instances where service providers have required that customers pay electronically and refused to accept cash payment. However, in those cases that has been brought before the legislation department at the Norwegian Ministry of Justice, the right of the consumer to pay in cash in accordance with the NFAA has been affirmed.

3.3.1. The Norwegian Ministry of Finance

In March 2012, NHO Service, the industry organization, sent a request to the Ministry of Finance asking whether two public transportation companies legally could refuse to accept cash as payment. The Ministry of Finance responded that the payment solutions offered by the transportation companies must comply with section 38 of the NFAA and section 14 of the NCBA, i.e. a consumer "always has a right to make settlements with legal tender at the recipient's location". (The Ministry of Justice considered the matter in April 2013

and their response was the same as the Ministry of Finance.)

In its annual report to the Norwegian parliament dated 5 April, 2017, the Ministry of Finance discusses strengthening the framework for cash payment, including giving the government a mandate to ensure that the right to pay with cash is preserved. The report advises that the government should consider the consequences for personal data protection and the society's safety if cash is removed completely. This is an indication that the Ministry currently does not support to remove cash completely.

3.3.2. The Ministry of Justice

In a statement dated 12 April 2013, the Norwegian Ministry of Justice discusses section 38 of the NFAA and the extent to which the right to make cash payments applies when the sale of goods is not "over the counter", e.g. when a service is provided at various locations and the consumer desires to pay with cash at one such location.

The Ministry of Justice is of the opinion that the expression "at the recipient's location", as used in section 38, must be interpreted quite narrowly, meaning the recipient's place of business only, i.e. the physical location where the business activities generating the claim takes place, cf. section 3 of the Norwegian Promissory Note Act. If the claim is not related to the recipient's business activities, "at the recipient's location" means the "recipient's residence", cf. Prop. No. 41 (1998-1999) p. 106. Thus, as a rule, a consumer has the right to pay with cash at "the recipient's place of business".

In a statement by the Ministry of Justice dated 18 October (2010 No. 5585/2010), the issue at hand was whether the municipality of Trondheim could set up a parking lot payment machine not permitting payments in cash. The Ministry opined that section 38 may not be derogated from in a manner detrimental to a consumer, cf. section 2 (1) of the Financial Contracts Act. Hence, the NFCA prevented the setting up of a parking meter without offering settlement in cash.

3.3.3. Other financial governmental bodies' opinion

The Norwegian FSA and the Norwegian Central Bank have, collectively, proposed new regulation pertaining to the banks' handling of cash as described above in 3.2.

In the proposal, the Norwegian FSA and the Norwegian Central Bank write that they have previously (in letters of 31/01/12 and 30/11/12) indicated that cash is the most appropriate payment method in the event of the public electronic payment system shuts down. They propose not to make any changes to the right to pay with cash at this point. It is conceivable that in the future several alternative and technically independent electronic payment systems will co-exist, and could thus serve as contingency arrangements in the event of a failure of the normal electronic payment system. However, according to the Norwegian FSA and the Norwegian Central Bank, there are currently no alternative electronic payment systems to the ordinary payment system that could act as a back-up system in the event of an emergency. Furthermore, from a personal data/privacy point of view, it is a concern that the public will not be able to pay anonymously if cash is removed.

3.3.4. Public discussions and general considerations

In November 2011, several industry organisations asked the Ministry of Finance to review the advantages and disadvantages of giving cash and digital payment equal legal status as a form of payment. In the opinion of the industry organisations, businesses should be permitted to decide for themselves whether to accept cash or digital payment when providing services or selling goods.

In its response on 22 January 2012, the Ministry of Finance refers to section 14 of the NCBA, which mandates that the consumer always has the right to settle with cash. Furthermore, the Ministry points out that permitting businesses to refuse cash from consumers would weaken the predictability to consumers as regards settlement, and could create significant obstacles to people who do not have the ability to make settlement in other forms than cash. The Ministry agrees that mandating the use of electronic payment could reduce crime, and that in some circumstances electronic payments could represent a more cost effective payment form than cash. However, the Ministry concludes that it will not conduct an analysis of the requirements pertaining to settlement in cash.

3.4. New legislation - Payment Services Directive 2

The Payment Services Directive (Directive 2015/2366 / EC - "PSD II") was published in the Official Journal 23 December, 2015. The directive replaces Directive 2007/64

/ EC (PSD I). The implementation deadline is set to 13 January, 2018.

The purpose of the directive is to modernize the regulatory framework for payment services and to promote innovation. Furthermore, the EU desire to increase consumer choice and reduce costs associated with the use of payment services, by facilitating that third parties may offer payment solutions. The aim is to increase the freedom of choice among consumers and reduce costs through the use of payment services.

The main consequences of the directive are as follows: 1) a broader scope than before with fewer exceptions, and 2) regulation of third parties that offer payment services (TPPs "third-party payment service providers"). The latter includes both payment order services and account services. These operate between the sellers' website and consumer's bank and aim to be an alternative to credit card payments. The transactions are usually carried out without the TPP having possession of the means of payment.

This means that large media and technology corporations such as Facebook, Amazon, Google and Apple will be able to provide payment services, competing head to head with traditional banks. Competition between the traditional actors and new service providers could lead to increased use of electronic solutions in circumstances where cash payment today is commonly used.

As Norway is not a member of the EU, but a member of the EEA (European Economic Area), this directive will have to become part of the EEA-agreement prior to being transposed into Norwegian law. This will probably happen sometime in the second half of 2018.

3.5 E-money- a new form of money

New technology has also paved the way for a new type of money, "e-money" (different from commercial bank money and central bank money). E-Money is issued by other actors than the traditional banks.

In a speech at the Norwegian Academy of Science (Det Norske Videnskaps-Akademi) on 25 April 2017, the Norwegian Central Bank pointed out that a challenge pertaining to e-money is trust. The public has confidence in the safety of bank deposits. E-money, on the other

hand, merely represents claims against the issuing companies, and there is no deposit guarantee scheme associated with this type of money.

In the same speech, the Norwegian Central Bank also mentioned other types of money than e-money each using its own unit of account and operating on closed electronic platforms, such as Amazon Coins, World of Warcraft coins and Q-coins. Such currencies may currently seem insignificant, but this may change as they have already been used as means of payment outside the domestic platform.

The Norwegian Central Bank also expressed scepticism about Bitcoin becoming widely used due to the absence of institutional backing. A consequence of lack of institutional support, the central bank predicts, is it will be difficult to build the trust necessary for Bitcoin to become widely accepted. Nonetheless, Bitcoin may still be a useful demonstration of the potential for digital currencies to form new, reliable payment rails.

Finally, the Norwegian Central Bank briefly touched on the subject of cyber-crime in its speech. Cyber-crime is on the rise, and the attacks are becoming ever more advanced. Thus, it is important that society is prepared to handle situations where the payment system shuts down due to a cyber-attack. As mentioned in section 3.2 above, the Norwegian Central Bank has proposed new regulations that would ensure the banks being prepared to meet the demand for cash following a failure in the electronic payment system.

3.6 Central bank-issued electronic money

The Norwegian Central Bank is currently reviewing the consequences of introducing electronic central bank money in Norway. It is worth noting, that a substantial part the money circulating among the public is already "electronic", whether it is in the form of electronic consumer deposits with commercial banks, or commercial bank deposits with central banks. However, central bank money issued directly to the general population (would be similar to physical cash) in Norway has never before taken an electronic form. Issuance of central bank-issued electronic money may be a potential final step in abolishing cash entirely by affording individuals another option outside existing payment mechanisms. Depending on the implementation, central bank-issued electronic

money may also support financial inclusion as well, by lowering the barriers to entry to transfer value electronically.

Physical cash has different properties than both E-money issued by private institutions and “electronic” money stored as deposits at commercial banks – it is legal tender, anonymous, and allows people with limited access to bank accounts to make payments. Further, it bears no interest, deteriorates in physical quality, and often does not involve third parties external to a transaction for custody and transfer of funds. An electronic version of physical cash, through central-bank issued electronic money, would likely share some of the characteristics of physical cash but would also be different from it in some ways – one obvious difference would be that transfers of central bank money would, for the general population, not require physical proximity for instantaneous “core settlement.”

There are many other structural considerations that need to be made for a central bank-issued electronic physical cash substitute. Deciding on the transaction privacy rules to apply would be of pivotal importance in any implementation – would this instrument be designed to maintain the anonymity of cash, or would there be trackable identities associated with transactions? Would an implementation use a centralized infrastructure to offer electronic access to central bank money to the general population, like the Dinero Electrónico account-based approach in Ecuador? Or would an implementation use distributed ledger technology?

Cryptocurrency implementations such as Bitcoin suffer from high price volatility, unwillingness by enterprises to accept the currency, and it lacks a reasonable governance structure. Such issues would be avoided by anchoring a “cryptocurrency” to an existing money supply with the protocol rules determined and administered by a central bank, and by adapting cryptocurrencies to function within a regulatory context. If embraced by central banks, such implementations could provide a new payment rail that may ultimately be able to transfer central bank money near-instantly. Many improvements to payment infrastructure have traditionally aimed to build upon existing payment rails, and streamline existing infrastructure – central bank-issued electronic money could form a whole new medium of money.

These solutions address the proposed disadvantages of electronic money relative to cash. Likely, central bank-issued electronic money would use phones as the instrument for value exchange. For those that do not have a phone to serve as a wallet, printed out papers with QR codes, perhaps could be printed out from local terminals in the neighborhood or from commercial banks in order to collect or transfer redeemable balances. Further, cash balances on phones would likely have a maximum limit, as central banks likely would not want to expend resources on customer service – if a phone was lost or stolen, the result would likely be like losing a wallet.

There are many other relevant questions regarding distribution approaches and mechanisms that the NCB would carefully consider before issuing electronic central-bank money. How would commercial banks be involved in the distribution process? Would this process be similar to the one today? Would the new electronic money compete with other third party payment services? Would it compete with commercial bank deposits? Any consideration of central bank-issued electronic money would also need to account for policy considerations, in addition to technical ones, for the Norwegian economy.

Summary of financial legislation:

The current Norwegian financial legislation protects the consumer’s right to pay with cash and obligates banks to handle cash.

Although there are currently several groups working to make Norway a cash free society, Norwegian financial authorities have not yet come out in support of making Norway a cash-free society.

The current government’s statements seem to suggest that new technical solutions would have to be implemented for a cash less society to become reality. Furthermore, as long as a significant number of people only use cash as payment, it is unlikely that the government will support measures that completely render cash obsolete.

New EU-legislation, such as PSD2, brings new entrants into the payment services market. Competition between the traditional players and new payment service

providers, such as Google and Apple, will most likely promote further technological development of new, safer and more cost efficient payment services. This could potentially reduce demand for cash even further, and possibly convincing public authorities to finally remove cash from circulation.

PART II

4. Data protection legislation

There is a general concern that protection of privacy will become difficult if cash is removed from circulation, as banks or other operators, in principle, then will have access to personal data information about every purchase and transaction a customer makes.

The Norwegian Data Protection Authority ("Norwegian DPA") grants the banks a general license to process personal data. The banks are permitted, in accordance with the section 33 (1) and (3) of the Personal Data Act and section 7-3 of the Personal Data Regulations, to process personal data for the following purposes: Customer management, invoicing and in relation to general banking and financial services, marketing and customer care, risk classification of customers and credit portfolios, prevention and detection of crime. The banks are obligated to delete personal data when the objective of the use has been met, cf. sections 28 and 11 of the Personal Data Act.

The Norwegian DPA is working towards more anonymous solutions on electronic payments, such as anonymous travel payment cards, re-fill cards etc. The Norwegian DPA is of the opinion that privacy should be better protected as electronic solutions become more widespread. The director of information at the DPA has stated that money transfers between people should be possible without having to leave electronic traces behind. A general concern from a privacy perspective is that if every small and big financial transaction is traceable, this information will in aggregate provide a detailed picture of who you are, your relationships, what interests, attitudes and behaviours you have.

In the abovementioned speech of 25 April 2017, the Norwegian Central Bank underscored the dependency on a third party when making electronic payments, in contrast to cash payments where payment is made directly between two parties.

The challenges related to the DPA concerns will require careful review.

5. Criminal legislation

One of the main arguments for a cashless society is that it will make it more difficult to commit white collar crime. These arguments are mostly related to money laundering and tax, see sections 5.1 and 5.2 below.

5.1. Money laundering

The purpose of the Norwegian Anti Money Laundering Act is to prevent criminal acts and identify transactions in connection with criminal acts or acts connected to terror, cf. its section 1. Pursuant to section 6 of the Norwegian Anti Money laundering Act, banks and other financial institutions are required to identify customers and to control and report suspicious transactions to the authorities. An overarching principle of this regulatory framework is the "know your customer"-principle and the obligation to report transactions that could relate to criminal- and terrorist activity. An important aspect in this regard is to trace the origins of funds that are involved in customer transactions.

Removal of cash from the economy would make it easier for financial institutions to fulfil their obligations pursuant to the anti-money laundering rules and could potentially also make it more difficult to "launder" proceeds from criminal activity through financial institutions. However, cryptocurrencies such as Bitcoin, being completely anonymous until converted to fiat currency currently pose KYC-challenges to financial institutions.

In addition to applying to banks and other financial institutions, these rules also apply to businesses selling goods when they receive cash payments in excess of NOK 40.000, cf. the section 4 (2) of the Anti-Money Laundering Act. Thus, this requirement compels retail stores and businesses to have in place costly and time consuming systems and controls. Removing cash could, according to the industry organization NHO in a statement of 6 November 2015, ease the burden on small and medium sized businesses in the retail segment.

5.2. Tax legislation

The Norwegian Tax Authorities support the proposals for a cashless society. Many of the typical crimes related

to tax evasion, such as the underground jobs market, are expected to become less of a problem if cash is removed from the economy. The Tax Authorities have proposed three solutions to make it more difficult to evade taxes by the use of cash: 1) to remove the NOK 500 and NOK 1000 banknotes, 2) a maximum permitted amount for cash payment, for example between NOK 20.000 to 40.000, and 3) amend the current legislation and replace the right to pay with cash with a right to use electronic solutions.

6. General amendments

In the event Norway would remove cash from the economy, there are many other Norwegian laws that would have to be amended as well. However, implementing such amendments should not be too burdensome, as they for the most part could be amended making the relevant statutes refer to payment in general without referring to cash. This includes provisions in the Accounting Procedures Act, the Debt Settlement Act, the Securities Trading Act, the Work Environment Act, the Law on Alternative Investment funds and several others.

PART III

7. Overall conclusion

In order for Norway to become a cashless society it will be necessary is to change the current status of cash as legal tender.

Even though some governmental bodies support removing cash from the economy, other governmental

bodies seem to support strengthening the right to use cash as payment.

Furthermore, as the Norwegian DPA and the Ministry of Finance have concerns pertaining to removing cash from the economy, and data protection issues would require careful review prior to taking this step.

The relevant governmental bodies have not made any clear indication as to when any new considerations or discussions of amendments necessary to remove cash from the economy could be expected. Technological developments over the next few years will probably indicate whether a cashless society is feasible by 2030. However, in light of recent statements and proposals by the Norwegian financial authorities and the Norwegian parliament, it is unlikely that the consumers' right to make payment in cash will be removed by 2020.

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